Saudi Arabia

National Strategy

The Saudi AI initiatives are led by the Saudi Data and AI Authority (SDAIA), which reports directly to the Prime Minister and consists of members chosen by the Prime Minister.[757] The Saudi Data and AI Authority's website provides basic information about the Kingdoms goals for AI.[758] In the September 2020 SDAIA and Riyadh signed a cooperative agreement for an AI Oasis.

In August 2020, SDAIA published a National Strategy for Data and AI.[759] The AI Strategy is to advance the KSA Vision 2030.[760][761] The AI Strategy states that this Vision will be achieved "through a multi-phased approach focused on addressing the national priorities by 2025, building foundations for competitive advantage in key niche areas by 2030, and becoming one of the leading economies utilizing and exporting Data & AI after 2030."[762] The National Strategy states 6 objectives:

1. "Ambition: Position KSA as the global hub where the best of Data & AI is made reality

2. Skills: Transform KSA's workforce with a steady local supply of Data & AI-empowered talents

3. Policies & Regulations: Enact the most welcoming legislation for Data & AI businesses and talents

4. Investment: Attract efficient, stable funding for qualified Data & AI investment opportunities

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[757] Saudi Gazette, *King Salman issues royal decrees, including setting up of industry and resources ministry (*Aug. 2019), https://saudigazette.com.sa/article/575953
[758] Saudi Data and AI Authority, Home, https://sdaia.gov.sa/
[759] Carrington Malin, *Saudi National Strategy for Data and AI* (Aug. 2020), https://www.sme10x.com/technology/saudi-national-strategy-for-data-and-ai-approved
[760] Government of Saudi Arabia, *Vision 2030* (2020), https://vision2030.gov.sa/en
[761] Catherine Jewell, *Saudi Arabia embraces AI-driven innovation* (Sept. 2018), https://www.wipo.int/wipo_magazine/en/2018/05/article_0002.html
[762] SDAIA, *National Strategy for Data & AI: Realizing our best tomorrow* (Oct. 2020), https://ai.sa/Brochure_NSDAI_Summit%20version_EN.pdf

5. Research & Innovation: Empower top Data & AI institutions to spearhead innovation and impact creation

6. Ecosystem: Stimulate Data & AI adoption with the most collaborative, and forward-thinking ecosystem"

Most of the goals focus on fostering an enabling business and regulatory environment. This includes education schemes that promote the development of a workforce that fits the industry's new needs. The government is undertaking major educational reform to foster the development of digital skills for jobs in emerging technology including AI.[763]

The National Strategy states, "As part of providing an attractive regulatory framework for Data & AI investments and businesses, we aim at having a strong framework to promote and support ethical development of Data & AI research and solutions. This framework will provide guidelines for the development of our data protection and privacy standards."[764] On policies and regulations, "NDMO is developing a number of regulatory frameworks including topics such as data privacy and freedom of information. In particular, Open Data has been identified as a priority topic, and the government has already made investments in open data platforms."

Late in October 2020, the SDAIA published National Data Governance Interim Regulations to govern the collection and use of personal data and the management of data by government entities.[765] These regulations appear to be broadly influenced by the GDPR and include extensive rights for data subjects and obligation for data controllers. For example, individuals will have the "right to be informed of the legal basis and purpose for the collection and processing of their personal data. Personal data cannot be collected or processed without the Data Subject's express consent." Data subjects will also have the "right to access personal

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[763] Catherine Early, *Saudi Arabia signs off on Artificial Intelligence policy* (Aug. 2020), https://www.globalgovernmentforum.com/saudi-arabia-signs-off-on-artificial-intelligence-policy/

[764] SDAIA, *National Strategy for Data & AI: Realizing our best tomorrow* (Oct. 2020), https://ai.sa/Brochure_NSDAI_Summit%20version_EN.pdf

[765] Albright Stonebridge Group, *ASG Analysis: Saudi Arabia Publishes National Data Governance Interim Regulations* (Oct. 21, 2020), https://www.albrightstonebridge.com/news/asg-analysis-saudi-arabia-publishes-national-data-governance-interim-regulations

data in possession of the Data Controller, including the right to correct, delete, or update personal data, destroy unnecessary data, and obtain a copy of the data in a clear format."

The SDAIA was established in 2019 with the aim of fostering "the digital ecosystem while also supporting the suite of values-based G20 AI Principles."[766] "Data is the single most important driver of our growth and reform and we have a clear roadmap for transforming Saudi Arabia into a leading AI and data-driven economy," said Dr Abdullah bin Sharaf Al Ghamdi, president of SDAIA.[767] SDAIA oversees three organizations: the National Data Management Office (NDMO), the National Information Center (NIC) and the National Center for AI (NCAI). The NDMO is responsible for the regulation of data which includes standardization and regulation of artificial intelligence as well as ensuring compliance. The NIC oversees the operation of government data infrastructure and government analytics. The implementation of the national AI strategy is the main responsibility of the NCAI. This includes facilitating capacity-building, AI innovation and raising awareness of AI as well as expanding education on AI.[768][769]

Saudi Arabia's Deputy Minister Dr. Ahmed AL Theneyan emphasized the importance of regulation in interviews about the Kingdom's AI Strategy. This includes education plans that promote the development of a workforce that fits the industry's new needs. The government is undertaking major educational reform to foster the development of digital skills for jobs in emerging technology including AI.[770] "The country is establishing a national data bank to consolidate more than 80 government datasets, the equivalent to 30 per cent of the government's digital assets. It

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[766] OECD G20 Digital Economy Task Force, *Examples of AI National Policies* 35, 41, 42 (2020), https://www.mcit.gov.sa/sites/default/files/examples-of-ai-national-policies.pdf
[767] Gulf News, *Saudi Arabia approves policy on Artificial Intelligence, expects SR500b windfall by 2030*, (Aug. 10, 2020), https://gulfnews.com/business/saudi-arabia-approves-policy-on-artificial-intelligence-expects-sr500b-windfall-by-2030-1.1597032000775
[768] Future of Life, *AI-Policy Saudi Arabia,* https://futureoflife.org/ai-policy-saudi-arabia/
[769] OECD G20 Digital Economy Task Force, *Examples of AI National Policies* 35, 41, 42 (2020), https://www.mcit.gov.sa/sites/default/files/examples-of-ai-national-policies.pdf
[770] Early, Catherine, Saudi Arabia signs off on Artificial Intelligence policy (Aug. 2020), https://www.globalgovernmentforum.com/saudi-arabia-signs-off-on-artificial-intelligence-policy/

is also planning to build one of the largest clouds in the region by merging 83 data centres owned by more than 40 government bodies."[771]

During the fight against COVID-19 the SDAIA launched two apps: the Tawakkalna app to manage movement permits for government and private sector employees and Tabaud to notify citizens when they have come in contact with someone who was infected with the virus.[772][773] *MIT Technology Review* reported that Tabaud is transparent, voluntary, and minimizes data collection.[774]

In 2017 Saudi Arabia granted the robot, Sophia, citizenship. This is a first worldwide and was met with mixed reactions.[775] CNBC said, "Sophia been touted as the future of AI, but it may be more of a social experiment masquerading as a PR stunt."[776] Bloomberg noted that "Migrant laborers can't become citizens; android Sophia can." [777]

Global AI Summit

The Global AI Summit, held in October 2020, is described as the "world's premier platform for dialogue that brings together stakeholders from public sector, academia and private sector, including technology companies, investors, entrepreneurs and startups to shape the future of Artificial Intelligence (AI)."[778] Speakers from across sectors explored the theme "AI for the Good of Humanity." Notably, several of the sessions focused on ethics and making use of AI for social causes with titles like:

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[771] Vishal Chawla, How Saudi Arabia Is Looking To Develop & Integrate Artificial Intelligence In Its Economy, Analytics India Magazine (Aug. 23, 2020), https://analyticsindiamag.com/how-saudi-arabia-is-looking-to-develop-integrate-artificial-intelligence-in-its-economy/

[772] SDAIA, *Tawakkalna,* https://ta.sdaia.gov.sa/En/

[773] SDAIA, *Tabaud,* https://tabaud.sdaia.gov.sa/indexEn

[774] MIT Technology Review, *COVID Tracing Tracker* (May 7, 2020), https://www.technologyreview.com/2020/05/07/1000961/launching-mittr-covid-tracing-tracker/,

[775] Future of Life, *AI Policy-Saudi Arabia*, https://futureoflife.org/ai-policy-saudi-arabia/

[776] Jaden Urbi and Sigalos MacKenzie, *The Complicated Truth about Sophia the Robot- an almost human robot or a PR stunt*, CNBC (June 2018), https://www.cnbc.com/2018/06/05/hanson-robotics-sophia-the-robot-pr-stunt-artificial-intelligence.html

[777] Tracy Alloway, *Saudi Arabia Gives Citizenship to a Robot,* Bloomberg (Oct. 2017), https://www.bloomberg.com/news/articles/2017-10-26/saudi-arabia-gives-citizenship-to-a-robot-claims-global-first

[778] Global AI Summit, *About Us*, https://www.theglobalaisummit.com/#about-us

"AI for the good of humanity", "AI for good, AI for all: Collective thinking on how access to AI can be democratized to shape and deliver positive societal impact" and "Misuse vs. Missed Use: The Ethics Question: Ethics and ethical frameworks as a tool in unleashing AI innovation".[779] In opening remarks, the President of the SDAIA stated "during the two days we will also be announcing several major partnerships and initiatives with our international partners to accelerate AI for sustainable development in low and middle income countries and to enable the sharing of AI best practices globally to ensure a more inclusive future powered by AI where no one is left behind." He emphasized the importance of working together internationally to ensure the sustainable development of AI.[780]

During the Global AI Summit, several international organizations announced new initiatives. The World Bank Group and SDAIA set out a new partnership to "help finance, stimulate, and accelerate the development and adoption of artificial intelligence technologies to serve people and development initially in Africa and globally at a later stage" and "to strengthen Saudi Arabia's role as a key contributor in supporting developing countries."[781] The International Telecommunications Union signed a Memorandum of Understanding with the Kingdom to "support global cooperation in the field of artificial intelligence." The ITU will also "see the development of an internationally-recognized system for countries to mobilize resources, providing assistance for official agencies that want to adopt AI technologies, and accreditation to meet economic requirements." Dr. Abdullah bin Sharaf Alghamdi, President of the SDAIA, stated: "The International Telecommunication Union will share the best practices in the field of artificial intelligence with the Kingdom. This will help in shedding light on how to sponsor and support emerging companies and new incubators in the national space, especially as there is no official framework that currently exists to support the AI readiness of countries and international cooperation."[782]

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[779] Global AI Summit, *Program,* https://www.theglobalaisummit.com/#program
[780] Global AI Summit, *AI for the Good of Humanity* (Oct. 21, 2020) (livestream), https://www.youtube.com/watch?v=uOGYQlhmb_8
[781] Global AI Summit, Press Releases, *Keen to harness benefits of artificial intelligence for all Saudi Arabia establishes new partnership with World Bank Group* (Oct. 2020), https://theglobalaisummit.com/news4.html
[782] Global AI Summit, Press Releases, *SDAIA and International Telecommunication Union sign MoU to Develop International Artificial Intelligence Framework* (Oct. 2020), https://theglobalaisummit.com/news10.html

Neom

The Kingdom has also initiated a smart city project called Neom. Neom "is an international project that will be led, populated and funded by people from all over the world." According to the FAQ, Neom will be a "semi-autonomous region with its own government and laws" in northwest Saudi Arabia on the Red Sea and home to one Million people by 2030.[783] Neom is envisioned to become a city that "will introduce a new model for urbanization and sustainability," built on five principles: sustainability, community, technology, nature, livability.[784]

Public Participation

The Saudi AI initiatives are led by the Saudi Data and AI Authority, which reports directly to the Prime Minister and consists of members chosen by the Prime Minister.[785] As far as can be gathered from the website, the Vision 2030 Strategy was developed by the Council of Ministers and the Council of Economic Affairs.[786]

The Vision 2030 website states their objectives and lists the respective programs in place to achieve them.[787] Further it describes the indicators and targets for every so-called "Theme" as well as information on the respective initiatives. There is also a section on "Vision Progress" that lists what has been done within the scope of these programs, however this only covers the year 2017 and 2018 and only provides a title and short explanation with no link for more specific information.[788] The Vision 2030, however, encompasses many different objectives, AI being only one of many. This makes it a good resource for development policy but not specifically for finding information on AI policy and initiatives.[789]

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[783] NEOM, *FAQ,* https://www.neom.com/en-us/static/pdf/en/NEOM_FAQ_EN.pdf
[784] NEOM, *Brochure*, https://www.neom.com/en-us/static/pdf/en/NEOM_BROCHURE_EN.pdf
[785] Saudi Gazette, *King Salman issues royal decrees, including setting up of industry and resources ministry* (Aug. 2019), https://saudigazette.com.sa/article/575953
[786] Vision 2030, Governance, https://vision2030.gov.sa/en/governance
[787] Kingdom of Saudi Arabia, *Vision 2030, Programs,* https://vision2030.gov.sa/en/programs#
[788] Kingdom of Saudi Arabia, *Vision 2030, Vision Progress,* https://vision2030.gov.sa/en/vision-progress
[789] Kingdom of Saudi Arabia, *Vision 2030 (*Oct. 2020), https://vision2030.gov.sa/en

Further, the SDAIA provides a digitized version of the strategy report. There is an email address under "Contact Us", however no feedback or input form, nor is it encourage or mentioned anywhere on the website.[790]

The Global AI Summit also provided important opportunities for individuals and organizations to express their views on AI policy.

G-20 Meetings

Saudi Arabia hosted the G-20 Digital Economy Ministers Meeting in June 2020. AI policy was a focal point of the discussions. The Digital Economy Task Force released a new report on the implementation of the OECD AI Principles.[791] The key agenda items selected by the Saudi government were: "Empowering People, by creating the conditions in which all people – especially women and youth – can live, work and thrive"; "Safeguarding the Planet, by fostering collective efforts to protect our global commons"; and "Shaping New Frontiers, by adopting long-term and bold strategies to share benefits of innovation and technological advancement."[792][793]

In November 2020, Saudi Arabia hosted the G20 Ministerial meeting in Riyadh. There was controversy surrounding the event as many human rights organizations protested the decision to allow the Kingdom to host the G20 meeting. Still, there was progress on fundamental rights associated with AI and digital technologies. The G20 Leaders in Riyadh stated, "We will continue to promote multi-stakeholder discussions to advance innovation and a human-centered approach to Artificial Intelligence (AI), taking note of the Examples of National Policies to Advance the G20 AI Principles. We welcome both the G20 Smart Mobility Practices, as a contribution to the well-being and resilience of smart cities

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[790] Kingdom of Saudi Arabia, *National Strategy for Data and AI,* https://ai.sa/index-en.html

[791] OECD G20 Digital Economy Task Force, *Examples of AI National Policies* (2020), https://www.mcit.gov.sa/sites/default/files/examples-of-ai-national-policies.pdf

[792] SDG Knowledge Hub, *G20 Digital Economy Ministers Meeting,* July 2020, https://sdg.iisd.org/events/g20-digital-economy-ministers-meeting/

[793] G20 Saudi Arabia, https://g20.org/en/Pages/home.aspx. [Editorial note: At the time of publication we found that the materials from the G20 summit that were available shortly after the Summit concluded, including the Leaders Declaration, were no longer available at the G20 website. Fortunately, copies of these documents are archived and available at the Internet Archive, https://web.archive.org]

and communities, and the G20 Roadmap toward a Common Framework for Measuring the Digital Economy."[794]

On Digital Economy, the G20 said "We acknowledge that universal, secure, and affordable connectivity, is a fundamental enabler for the digital economy as well as a catalyst for inclusive growth, innovation and sustainable development. We acknowledge the importance of data free flow with trust and cross-border data flows." The G20 Declaration further said, "We support fostering an open, fair, and non-discriminatory environment, and protecting and empowering consumers, while addressing the challenges related to privacy, data protection, intellectual property rights, and security."

AI Oversight

The Saudi Data and Artificial Intelligence Authority (SDAIA) was established by a royal decree in 2019.[795] The SDAIA is directly linked to the Prime Minister and will be governed by a board of directors chaired by the Deputy Prime Minister.

The KSA Human Rights Commission was founded in 2005 and "has full independence in the exercise of its tasks for which it was established and stipulated in its organization." The Commissions states that it "aims to protect and promote human rights in accordance with standards International human rights in all fields, raising awareness of them and contributing to ensuring that this is implemented in light of the provisions of Islamic Sharia."[796]

Data Protection

The Kingdom of Saudi Arabia does not yet have a specific national data protection legislation.[797] There are, however, "privacy-related concepts

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[794] G20 Riyadh Summit, *Leaders Declaration* (Nov. 21-22, 2020), https://g20.org/en/media/Documents/G20%20Riyadh%20Summit%20Leaders%20Declaration_EN.pdf

[795] Arab News, *King Salman issues royal decrees, including creation of industry and resources ministry* (Aug. 30, 2019), https://www.arabnews.com/node/1547546/saudi-arabia

[796] Kingdom of Saudi Arabia, *Human Rights Commission,* https://hrc.gov.sa/en-us/aboutHRC/AboutHRC/Pages/HRCvision.aspx.

[797] OneTrust DataGuidance, *Key Takeaways: Data Privacy in the Middle East* (June 2020), https://www.dataguidance.com/opinion/key-takeaways-data-privacy-middle-east

legislation, including Shari'ah principles against the invasion of privacy or disclosure of secrets." Further, "sectoral regulations contain data protection obligations regarding organisations working in telecommunication, IT/cloud services, healthcare and financial services industries."[798][799]

As noted above, the National AI Strategy proposes strong rules for data protection. "This initiative requires a strong regulatory framework to provide high standards in terms of data protection and privacy, in line with our ethical approach to developing our data sector. Doing this would define the framework through which government and private organizations will be able to benefit from the opportunities provided by data. The regulatory framework will include specifications on data collection, classification, sharing, open data policy and freedom of information."[800] The Strategy also notes that "NDMO is developing a number of regulatory frameworks including topics such as data privacy and freedom of information."

According to PWC, the E-Commerce Law of 2019 "focuses on regulating e-commerce business practices requiring increased transparency and consumer protection, with the goal of enhancing trust in online transactions. The law also contains provisions aimed at protecting the personal data of e-commerce customers. Specifically, the law specifies that service providers will be responsible for protecting the personal data of customers in their possession or 'under their control.' 'Control' in a data protection context exists where an organisation can make decisions concerning that personal data, such as why to collect it in the first place, what to do with it, how long to keep it, and who to share it with. A service provider may still have 'control' of personal data where it passes the data on to a third party as part of an outsourcing or other arrangement."[801] The KSA E-Commerce Law also prohibits service providers from using customers' personal data for 'unlicensed or unauthorised' purposes, and

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[798] OneTrust DataGuidance, *Saudi Arabia Data Protection Overview* (Nov. 2019), https://www.dataguidance.com/notes/saudi-arabia-data-protection-overview
[799] DLA Piper, *Data Protection Laws of the World, Saudi Arabia* (Jan. 2019), https://www.dlapiperdataprotection.com/index.html?t=law&c=SA
[800] SDAIA, *National Strategy for Data & AI: Realizing our best tomorrow* (Oct. 2020), https://ai.sa/Brochure_NSDAI_Summit%20version_EN.pdf
[801] PWC, *Saudi Arabia Data Privacy Landscape* (Nov 2019), https://www.pwc.com/m1/en/services/tax/me-tax-legal-news/2019/saudi-arabia-data-privacy-landscape-ksa.html

from disclosing personal data to third parties without the customer's consent.

Data Governance

Further, in October 2020, the SDAIA, published National Data Governance Interim Regulations. The regulations cover five topics: "data classification by public entities, protection of personal data, data sharing between public entities, freedom of information requests, and open data. Much of the document, including the regulation on the protection of personal data, draws significantly from international regulations such as the EU's General Data Protection Regulation (GDPR)."[802]

OECD/G20 AI Principles

The Kingdom has endorsed the G20 AI Principles. Regarding implementation of the AI Principles, the OECD notes their National Center for AI (NCAI), the Saudi Data and AI Authority and highlights their work towards trustworthy AI in health.[803]

Human Rights

Freedom House gives Saudi Arabia low marks for to civil liberties and political rights.[804] Due to its membership in the United Nations the Saudi Arabian Government (UDHR) has inherently committed to upholding human rights standards which include those laid out in the (UDHR).[805] However, Saudi Arabia was the sole abstainer on the Declaration among Muslim nations, stating that it violated Sharia law.[806]

Upon pressure from the American foreign policy advocacy group, Freedom Forward, the mayors of New York, London, Paris and Los

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[802] Albright Stonebridge Group, *ASG Analysis: Saudi Arabia Publishes National Data Governance Interim Regulations* (Oct. 21, 2020), https://www.albrightstonebridge.com/news/asg-analysis-saudi-arabia-publishes-national-data-governance-interim-regulations
[803] G20 Digital Economy Task Force, *Examples of National AI Policies* (2020), https://www.mcit.gov.sa/sites/default/files/examples-of-ai-national-policies.pdf
[804] Freedom House, *Freedom in the World 2020: Saudi Arabia (2020),* https://freedomhouse.org/country/saudi-arabia/freedom-world/2020
[805] Human Right Watch, International Human Rights Standards, https://www.hrw.org/reports/1997/saudi/Saudi-07.htm
[806] Human Rights Watch, Saudi Arabia: Human Rights Developments, https://www.hrw.org/reports/1992/WR92/MEW2-02.htm

Angeles chose to boycott the G20 meeting in Riyadh due to the human rights violations committed by the Saudi government.[807]

Evaluation

Saudi Arabia has emerged as an influential leader among the G20 countries and a powerful AI economic force globally. Although the country has a poor track record on human rights, Saudi Arabia's engagement with global AI policy is having a liberalizing influence. Not only has Saudi Arabia hosted important meetings of the G-20, the Kingdom also organized a successful global summit on AI that brought together government representatives, industry leaders, and academics and civil society. Saudi Arabia has endorsed the G20 AI Principles, but steps still should be taken to strengthen human rights, to promote public participation in AI policymaking within country, and to create mechanisms, including a data protection authority, to provide independent oversight of AI deployment.

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[807] Natasha Turak, *Saudi Arabia loses vote to stay on UN Human Rights Council; China, Russia and Cuba win seats,* CNBC (Oct. 14, 2020), https://www.cnbc.com/2020/10/14/saudi-arabia-loses-vote-for-un-human-rights-council-seat-china-russia-win.html; Freedom Forward, *Boycotting the Saudi G20: Our Successes* (Nov. 16, 2020), https://freedomforward.org/2020/11/16/boycotting-the-saudi-g20-our-successes/